

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

**JESSICA JONES, MICHELLE VELOTTA, and
CHRISTINA LORENZEN on Behalf of
Themselves and All Others Similarly Situated,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, VARSITY SPIRIT,
LLC, VARSITY SPIRIT FASHION &
SUPPLIES, LLC, U.S. ALL STAR
FEDERATION, INC., JEFF WEBB,
CHARLESBANK CAPITAL PARTNERS LLC,
and BAIN CAPITAL PRIVATE EQUITY,**

Defendants.

Case No. 2:20-cv-02892-SHL-cgc

DEFENDANT JEFF WEBB'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT
CLASS ACTION

Defendant Jeff Webb, through his undersigned counsel, and pursuant to Federal Rule of Civil Procedure 12(b)(6), hereby moves this Court to dismiss Plaintiffs' Complaint Class Action (ECF No. 1) for failure to state a claim upon which relief can be granted.

Pursuant to Local Rule 7.2(d), Mr. Webb requests oral argument because he believes it will assist the Court in understanding the motion and the attendant issues and to answer any questions the Court may have.

WHEREFORE, for the reasons set forth in his Memorandum of Law in Support, filed contemporaneously herewith, Mr. Webb respectfully requests that the Court dismiss Plaintiffs' Complaint.

Dated: March 12, 2021

By: /s/ Paul E. Coggins

Paul Coggins* (TX Bar #04504700)
Brendan Gaffney* (TX Bar #24074239)
LOCKE LORD LLP
2200 Ross Avenue, Suite 2800
Dallas, TX 75201
Phone: (214) 740-8000
Fax: (214) 740-8800
pcoggins@lockelord.com
bgaffney@lockelord.com

Talis C. Trevino* (GA Bar #181896)
LOCKE LORD LLP
Terminus 200, Suite 1200
3333 Piedmont Road NE
Atlanta, GA 30305
Phone: (404) 870-4600
Fax: (404) 872-5547 (fax)
talis.trevino@lockelord.com

* Admitted *pro hac vice*

Edward L. Stanton III (TN Bar #018904)
BUTLER SNOW LLP
6075 Poplar Avenue, Suite 500
Memphis, Tennessee 38119
Telephone: (901) 680-7336
Facsimile: (901) 680-7201
Edward.Stanton@butlersnow.com

ATTORNEYS FOR JEFF WEBB